

UNITED STATES DISTRICT COURT
for the

Southern District of Illinois

ROBERT BOSTIC

Plaintiff/Petitioner(s)

v.

DOCTOR VIPEN SHAH
CANTINA FOOD SERVICES
SUZANNA BAILEY
WEXFORD MEDICAL SOURCES

Defendant/Respondent(s)

Case Number: 15-1054-SMY

(Clerk's Office will provide)

- ☒ CIVIL RIGHTS COMPLAINT
pursuant to 42 U.S.C. §1983 (State Prisoner)
☐ CIVIL RIGHTS COMPLAINT
pursuant to 28 U.S.C. §1331 (Federal Prisoner)
☐ CIVIL COMPLAINT
pursuant to the Federal Tort Claims Act,
28 U.S.C. §§1346, 2671-2680, or other law

I. JURISDICTION

SCANNED AT PINCKNEYVILLE CC and E-mailed
9/23/15 by 8 17 pages
date initials No.

Plaintiff: ROBERT BOSTIC

A. Plaintiff's mailing address, register number, and present place of
confinement

Defendant #1:

B. Defendant DOCTOR VIPEN SHAH is employed as
(a) (Name of First Defendant)

CHIEF MEDICAL CARE PROVIDER
(b) (Position/Title)

with (IDOC) 5035 STATE ROUTE 154
(c) (Employer's Name and Address)

PINCKNEYVILLE, IL, 62274 (WEXFORD MEDICAL SOURCES)

At the time the claim(s) alleged this complaint arose, was Defendant #1
employed by the state, local, or federal government? ☐ Yes ☒ No

If your answer is YES, briefly explain:

Defendant #2:

C. Defendant CANTINA FOOD SERVICES is employed as

(Name of Second Defendant)

FOOD SERVICE PROVIDER

(Position/Title)

with (IDOC) CONTRACTED BY WEXFORD MEDICAL

(Employer's Name and Address)

SOURCES

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☐ Yes ☒ No

If you answer is YES, briefly explain:

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

DEFENDANT: SUZANN BAZLEY
TITLE: FOOD SERVICE ADMINISTRATOR
WITH: (IDOC) 1301 CONCORDIA COURT
SPRINGFIELD, IL 62794

EXPLAIN: FOOD SERVICE ADM, THE PERSON WHO DECIDES WHAT AND HOW MUCH FOODS ARE SERVED IN (IDOC)

AT THE TIME THE CLAIM(S) ALLEGED IN THIS COMPLAINT AROSE, DEFENDANT #3 WAS EMPLOYED BY THE STATE

DEFENDANT: WEXFORD MEDICAL SOURCES EXPLAIN:
TITLE: HEALTHCARE PROVIDER
WITH: (IDOC)

AT THE TIME THE CLAIM(S) ALLEGED IN THIS COMPLAINT AROSE, DEFENDANT #4 WAS NOT EMPLOYED BY STATE, LOCAL, OR FEDERAL GOVERNMENT

II. PREVIOUS LAWSUTTS

A. Have you begun any other lawsuits in state or federal court relating to your imprisonment?
☐ Yes ☒ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:
Plaintiff(s):

N/A

Defendant(s):

N/A

2. Court (if federal court, name of the district; if state court, name of the county):

3. Docket number:

4. Name of Judge to whom case was assigned:

N/A

5. Type of case (for example: Was it a habeas corpus or civil rights action?):

N/A

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

N/A

7. Approximate date of filing lawsuit:

8. Approximate date of disposition:

N/A

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☒ Yes ☐ No

C. If your answer is YES,

1. What steps did you take? *FILED A COUPLE OF GRIEVANCES APPX 2014* *SEPT. 2, 2014*
ABOUT RETALIATION OF NURSE PUTTING ME IN SEG, 30 DAYS

2. What was the result?

DID NOT GET A RESPONSE

D. If your answer is NO, explain why not.

N/A

E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities?

☐ Yes ☐ No

F. If your answer is YES,

1. What steps did you take?

N/A

2. What was the result?

N/A

G. If your answer is NO, explain why not.

N/A

H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not

*AS SOON AS ANY RESPONSE COMES IN, I'LL
SEND AS "EXHIBITS"*

AT ALL TIMES DEFENDANTS ARE SUED IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES, WHILE ACTING UNDER COLOR OF LAW.

COUNT I. DEFENDANTS: VIPEN SHAH, WEXFORD MEDICAL SOURCES, WARDEN LASH-BROOK, AND ASSISTANT WARDEN SPELLER CONSPIRED TO VIOLATE PLAINTIFFS RIGHTS BY NOT PROVIDING HIM ADEQUATE MEDICAL CARE, AND FORCING HIM TO HAVE DAILY ALTERCATIONS FROM HOUSING HIM AND OTHER ADA INMATES (I/M) IN A SINGLE (1) MAN CELL AND REFUSING TO TRANSFER HIM OR TO PUT JUST (2) I/M IN A CELL INSTEAD OF THE (4) HOUSED IN SUCH A SMALL CELL.

ON 7-²~~1~~ PLAINTIFF ARRIVED AT PENCKNEYVILLE (PNK) AND WAS ONLY TAKING THE PILL FORM OF INSULIN - A DIABETIC MEDICATION. WHEN PLAINTIFF SAW DEFENDANT (SHAH) HE REPEATEDLY REQUESTED TO HAVE THE PROPER AND ADEQUATE MEDICAL CARE PROTECTED BY THE UNITED STATES CONSTITUTION AND FOUND IN SEVERAL SUPREME COURT DECISIONS: ESTELLE V. GAMBLE AND FARMER V. BRENNAN. THIS IS EXACTLY HOW PLAINTIFF SPOKE TO (SHAH) AND HAD WRITTEN TO (WEXFORD), (LASHBROOK), AND (SPELLER). NOT ONE DEFENDANT RESPONDED, SO HE HAD TO FILE THIS INSTANT COMPLAINT. AT PLAINTIFF'S LAST DOCTOR VISIT SHAH TOLD HIM "YOU'RE OKAY, JUST DRINK MORE WATER." SHAH KNEW THAT PLAINTIFF WAS ONLY A TYPE II DIABETIC AND NEED HIS TYPE II MEDICATION BOOSTED OR RAISED TO A DOSE TO HELP HIM MAINTAIN A THERAPEUTIC LEVEL WHERE HE HAS ENOUGH INSULIN FROM HIS OWN BODY TO METABOLIZE THE SUGAR HE EATS. INSTEAD OF A PROPER DIAGNOSIS (SHAH), IN HIS ANGER ORDERED PLAINTIFF TO TAKE A SHOT (INSULIN). THE RESULTS HAVE BEEN CATASTROPHIC AT THE LEAST. PLAINTIFF'S "ACCU-CHECK" LEVELS HAS NOW BECOME ERRATIC AND EXTREMELY UNMANAGABLE. LOW AT TIMES, THEN HIGH AT OTHER TIMES. PLAINTIFF EXPLAINED TO ALL PARTIES THAT AS A TYPE II DIABETIC HE SHOULD ONLY BE TAKING THE PILL FORM OF INSULIN, NOT A SHOT. PLAINTIFF'S VISION HAS NOW WORSENERED AND HE BELIEVES HIS OTHER VITAL ORGANS HAVE BECOME EFFECTED ALSO (E.G. LIVER, PANCREAS, ^{PROSTATE} AND OTHERS). ALL ORAL AND WRITTEN REQUEST HAVE BEEN IGNORED. WHY? "PLAUSABLE DENIABILITY." DEFENDANTS VIOLATED PLAINTIFFS RIGHTS WHEN THEY KNEW OR SHOULD HAVE KNOWN THEIR ACTIONS COULD OR WOULD CAUSE IRREPARABLE INJURY, BUT DID SO MALICIOUSLY AND INTENTIONALLY FOR NO PENOLOGICAL PURPOSE, AS A RESULT PLAINTIFF SUFFERS FROM: SEVERE HEADACHES, SEVERE DEPRESSION, ERRATIC SUGAR COUNTS, PAIN IN HIS EXTREMITIES AND OTHER MENTAL INJURIES TO BE PROVEN AT TRIAL SEE: EXHIBIT - MEDICAL

COUNT II, DEFENDANT VIPEN SHAH, SUZANNA BAILEY, DEPUTY DIRECTOR MARCUS HARDY, DIRECTOR GLADYS WELSON AND WARDEN ~~DEAN~~ CANTONA FOOD SERVICES, CONSPIRED TO VIOLATE PLAINTIFF'S RIGHTS BY SERVING HIM A SOY-BASED DIET, AND SHAH REFUSING TO ORDER A SOY-FREE DIET.

ON JAN 27, 2011 PLAINTIFF ARRIVED AT THE ILLINOIS DEPARTMENT OF CORRECTIONS (IDOC). UPON HIS ARRIVAL HE WAS WRONGFULLY SERVED/FED A SOY-BASED DIET, THIS WAS DONE EVERYDAY SINCE HIS ARRIVAL, BEFORE COMING TO (IDOC) PLAINTIFF DID NOT EXPERIENCE EXTREME GAS, SEVERE CONSTIPATION, FATIGUE, SEVERE STOMACH PAINS, AND LATHARGY, ALL SYMPTOMS HE NOW EXPERIENCES EVERYDAY. PLAINTIFF RECENTLY LEARNED FROM 'DWENS'-ANOTHER INMATE WHO SHOWED HIM WRITTEN 'FACTS' OFF THE INTER-NET THAT THE REASONS HE HAD THESE PROBLEMS WERE FROM THE SOY HE EATS DAILY. PLAINTIFF'S CONSTIPATION HAS LASTED OVER (5) DAYS AT THE MOST (6) DAYS AND DOZENS OF (3) DAY INTERVALS, CAUSING HIM SEVERE AND CONSTANT PAIN OVER 8 HOURS DURATIONS, ON OR ABOUT DECEMBER 26, 2014 HE TORE HIS ANUS TRYING TO PASS HIS STOOL, THE FECES WAS OVER 3 INCHES WIDE, SO WHEN HE WIPED HIS ANUS THERE WAS BLOOD. NOT LONG AFTER HE SAW SHAH AGAIN. AFTER HE DESCRIBED THE PAIN AND BLOOD HE SAW, SHAH TOLD HIM DON'T WORRY, JUST DRINK MORE WATER. THEN SHAH REFUSED TO GIVE HIM A THYROID HORMONE LEVEL CHECK, AND ORDER A SOY-FREE DIET, SEVERAL TIMES HE HAD ALMOST IMMEDIATE STOMACH PAINS AFTER EATING SOY. PLAINTIFF HAS FILED SEVERAL GRIEVANCES AND WRITTEN COMPLAINTS THEN RE-SENT THEM AGAIN TO EVERY "CO." PARTY/DEFENDANT IN THIS COMPLAINT. ALL REQUEST TO BE GIVEN A SOY-FREE DIET HAS GONE UNANSWERED. PLAINTIFF EXPLAINED TO EACH HOW HE LEARNED THAT THE WOMEN IN (IDOC) FILED A LAW-SUIT AND WON. THEY NO LONGER GET SOY-BASED MEALS, ALTHOUGH DEFENDANTS KNOW THAT THE SOY-BASED DIETS ARE CAUSING SEVERE MEDICAL PROBLEMS BUT HAS INCREASED THE AMOUNT OF SOY SERVED TO THE MEN SINCE 2009-11. PLAINTIFF HAS BEEN IN SEVERAL FIGHTS, AND ARGUMENTS WHICH COULD HAVE CAUSED SEVERE INJURIES, ALL BECAUSE OF HIM PASSING GAS SO MUCH. DEFENDANTS VIOLATED PLAINTIFF RIGHTS WHEN THEY KNEW OR SHOULD HAVE KNOWN THEIR ACTIONS COULD OR WOULD CAUSE HIM IRREPARABLE INJURY BUT DID SO MALESCIOUSLY AND INTENTIONALLY FOR NO PENOLOGICAL PURPOSE. AS A RESULT PLAINTIFF SUFFERS FROM: SEVERE HEADACHES, EXTREME GAS, CONSTIPATION, FATIGUE, SEVERE STOMACH PAINS, LATHARGY AND OTHER MENTAL INJURIES TO BE PROVEN AT TRIAL. SEE: EXHIBIT-MEDICAL

60916

MEMORANDUM OF LAW IN SUPPORT OF

1. IN SUPPORT OF MOTION FOR RECRUITMENT OF COUNSEL;
PLAINTIFF WILL HAVE TO SUBPOENA AND DEPOSE SEVERAL WITNESSES, SOME EXPERTS, SOME INMATES TRANSFERRED TO OTHER FACILITIES, DEFENDANTS/STAFF NO LONGER EMPLOYED BY (DOC) TABRON V. GRACE, 623d at 156; MONTGOMERY V. PINTCHAK, 294 F.3d 492, 502 (3d Cir. 2002)
- 2 U.S. CONST. AMEND, 8 KEY NOTE 8 RAMOS V. LAMM, 639 F.2d 559 (1980)
UNITED STATES SUPREME COURT MANDATES ADEQUATE MEDICAL CARE KEYNOTE 6 PRISON KEY LAW 17 "GOVERNMENT HAS THE OBLIGATION TO PROVIDE ADEQUATE MEDICAL CARE FOR THOSE WHOM IT IS PUNISHING, ESTELLE V. GAMBLE, 97 S.Ct. 285 (1976)
3. EXHIBIT - MEDICAL
MEDICAL TREATMENT

709/6

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

\$ 250,000.00 COMPENSATORY DAMAGES
 \$ 750,000.00 PUNITIVE DAMAGES
 \$ 50,000.00 ATTORNEY FEES
 \$ 10,000.00 LEGAL FEES

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 9-20-15
 (date)

P.O. BOX # 999
 Street Address

PINCKNEYVILLE, IL, 62274
 City, State, Zip

x Robert L Bostic
 Signature of Plaintiff

ROBERT BOSTIC
 Printed Name

M2560 M24560
 Prisoner Register Number

 Signature of Attorney (if any)

1B.16

COMMITTED PERSON'S GRIEVANCE

Date: 10 APRIL 2015 Committed Person: ROBERT BOSTIC ID#: 1724560

Present Facility: Pineknayville Facility where grievance issue occurred: Pineknayville

NATURE OF GRIEVANCE:

☐ Personal Property ☐ Mail Handling ☐ Restoration of Good Time ☐ Disability
☐ Staff Conduct ☐ Dietary ☒ Medical Treatment ☐ Other (specify): _____
☐ Transfer Denial by Facility ☐ Transfer Denial by Transfer Coordinator
☐ Disciplinary Report: _____ Date of Report: _____ Facility where issued: _____

Note: Protective Custody Denials may be grieved immediately via the local administration on the protective custody status notification.

Complete: Attach a copy of any pertinent document (such as a Disciplinary Report, Shakedown Record, etc.) and send to: Counselor, unless the issue involves discipline, is deemed an emergency, or is subject to direct review by the Administrative Review Board. Grievance Officer, only if the issue involves discipline at the present facility or issue not resolved by Counselor. Chief Administrative Officer, only if EMERGENCY grievance. Administrative Review Board, only if the issue involves transfer denial by the Transfer Coordinator, protective custody, involuntary administration of psychotropic drugs, issues from another facility except personal property issues, or issues not resolved by the Chief Administrative Officer.

Brief Summary of Grievance: I HAVE TAKEN PRILDOC, OR generic FOR PRILDOC, FOR APPROXIMATELY 10 YEARS. I HAVE A SERIOUS ACID-REFLUX condition
MY PRESCRIPTION FOR THE DRUG PRAZOLE HAS RUN OUT AND I'M UNABLE TO GET IT REFILLED. DR SHAH TELLS ME THERE WILL BE NO MORE MEDICATION FOR MY SERIOUS condition. He explained there will be no replacement. WITHOUT THE medication my REFLUX symptoms FLARE UP daily.

Relief Requested: I RESPECTFULLY REQUEST MY PRILDOC-OR generic PRESCRIPTION BE REFILLED AND CONTINUED INDEFINITELY.

☐ Check only if this is an EMERGENCY grievance due to a substantial risk of imminent personal injury or other serious or irreparable harm to self.

Robert Bostic 1724560 10 APRIL 2015
 Committed Person's Signature ID# Date
 (Continue on reverse side if necessary)

Counselor's Response (if applicable)

Date Received: 4/13/15 ☐ Send directly to Grievance Officer ☐ Outside jurisdiction of this facility. Send to Administrative Review Board, P.O. Box 19277, Springfield, IL 62704-9277

Response: CU. This is a pharmacy guideline not Dr. Shah. Pepcid is not to be given long term. Pepcid is an antihistamine blocker and after long term use it can be unbeneficial. If he has problems then he can be re-evaluated to see what other medication can be given short term to help.

V Hubbard/CCU [Signature] 4/14/15
 Print Counselor's Name Counselor's Signature Date of Response

EMERGENCY REVIEW

Date Received: _____ Is this determined to be of an emergency nature? ☐ Yes; expedite emergency grievance ☐ No; an emergency is not substantiated. Committed person should submit this grievance in the normal manner.

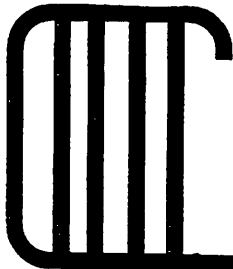
 Chief Administrative Officer's Signature Date

Distribution: Master File; Committed Person

Page 1
 Printed on Recycled Paper

150F16
 DOC 0046 (Eti. 10/2001)
 (Replaces DC 3657)

ENCLOSURE-MEDICAL



**Illinois
Department of
Corrections**

Pat Quinn
Governor

S. A. Godinez
Director

**Pinckneyville Correctional Center
5835 State Route 154
Pinckneyville, IL 62274-3410**

**Telephone: (618) 357-9722
TDD: (800) 526-0844**

MEMORANDUM

DATE: April 21, 2015

TO: Counselor Hubbard

FROM: Christine Brown, HCUA

SUBJECT: Response to grievance from Offender Bostic, M24560

This is in response to a grievance dated 4/10/15 and received in the HCU on 4/15/15.
This is a pharmacy guideline not Dr. Shah. Pepcid is not to be given long term. Pepcid is an antihistamine blocker and after long term use it can be unbeneficial. If he has problems then he can be re-evaluated to see what other medication can be given short term to help.

CB:aw

Cc: Offender/Clinical Services
Medical File
File

160F16

over
 SOY INFANT FORMULA:
 BIRTH CONTROL PILLS FOR BABIES

Babies fed soy-based formula have 13,000 to 22,000 times more estrogen compounds in their blood than babies fed milk-based formula. Infants exclusively fed soy formula receive the estrogenic equivalent of at least four birth control pills per day.

Male infants undergo a testosterone surge during the first few months of life, when testosterone levels may be as high as those of an adult male. During this period, baby boys are programmed to express male characteristics after puberty, not only in the development of their sexual organs and other masculine physical traits, but also in setting patterns in the brain characteristic of male behavior.

10 NC 10
 In animals, studies indicate that phytoestrogens in soy are powerful endocrine disruptors. Soy infant feeding—which floods the bloodstream with female hormones that inhibit testosterone—cannot be ignored as a possible cause of disrupted development patterns in boys, including learning disabilities and attention deficit disorder. Male children exposed to DES, a synthetic estrogen, had testes smaller than normal on maturation and infant marmoset monkeys fed soy isoflavones had a reduction in testosterone levels up to 70 percent compared to milk-fed controls.

over
 Almost 15 percent of white girls and 50 percent of African-American girls show signs of puberty, such as breast development and pubic hair, before the age of eight. Some girls are showing sexual development before the age of three. Premature development of girls has been linked to the use of soy formula and exposure to environmental estrogen-mimickers such as PCBs and DDE.

Intake of phytoestrogens even at moderate levels during pregnancy can have adverse affects on the developing fetus and the timing of puberty later in life.

SOY DANGERS SUMMARIZED

High levels of phytic acid in soy reduce assimilation of calcium, magnesium, copper, iron and zinc. Phytic acid in soy is not neutralized by ordinary preparation methods such as soaking, sprouting and long, slow cooking, but only with long fermentation. High-phytate diets have caused growth problems in children.

Trypsin inhibitors in soy interfere with protein digestion and may cause pancreatic disorders. In test animals, soy containing trypsin inhibitors caused stunted growth.

Soy phytoestrogens disrupt endocrine function and have the potential to cause infertility and to promote breast cancer in adult women.

Soy phytoestrogens are potent antithyroid agents that cause hypothyroidism and may cause thyroid cancer. In infants, consumption of soy formula has been linked to autoimmune thyroid disease.

Vitamin B₁₂ analogs in soy are not absorbed and actually increase the body's requirement for B₁₂.

Soy foods increase the body's requirement for vitamin D. Toxic synthetic vitamin D₂ is added to soy milk.

Fragile proteins are over-denatured during high temperature processing to make soy protein isolate and textured vegetable protein.

Processing of soy protein results in the formation of toxic lysinoalanine and highly carcinogenic nitrosamines.

Free glutamic acid or MSG, a potent neurotoxin, is formed during soy food processing and additional amounts are added to many soy foods to mask soy's unpleasant taste.

Soy foods contain high levels of aluminum, which is toxic to the nervous system and the kidneys.

The Weston A. Price Foundation is supported solely by membership contributions and private donations and does not accept funding from the meat or dairy industries.

EXHIBIT-SOY

Soy Alert!



THE
 WESTON A. PRICE
 FOUNDATION*

for Wise Traditions
 IN FOOD, FARMING AND THE HEALING ARTS
 Education • Research • Activism

Soy Alert! is a project of
 The Weston A. Price Foundation
 PMB Box 106-380 4200 Wisconsin Avenue, NW
 Washington, DC 20016
 (202) 363-4394
 info@westonaprice.org
 www.westonaprice.org

Copyright © 2010 The Weston A. Price Foundation
 All Rights Reserved

Myths and Truths About Soy

Myth: Soy estrogens (isoflavones) are good for you.
Truth: Soy isoflavones are phyto-endocrine disruptors. At dietary levels, they can prevent ovulation and stimulate the growth of cancer cells. As little as four tablespoons of soy per day can result in hypothyroidism with symptoms of lethargy, constipation, weight gain and fatigue.

Myth: Soy isoflavones and soy protein isolate have GRAS (Generally Recognized as Safe) status.
Truth: Archer Daniels Midland recently withdrew its application to the FDA for GRAS status for soy isoflavones following an outpouring of protest from the scientific community. The FDA never approved GRAS status for soy protein isolate because of concern regarding the presence of toxins and carcinogens in processed soy.

Myth: Soy foods are good for your sex life.
Truth: Numerous animal studies show that soy foods cause infertility in animals. Soy consumption lowers testosterone levels in men. Tofu was consumed by Buddhist monks to reduce libido.

Myth: Soybeans are good for the environment.
Truth: Most soybeans grown in the US are genetically engineered to allow farmers to use large amounts of herbicides, creating toxic runoff.
Myth: Soybeans are good for developing nations.
Truth: In third world countries, soybeans replace traditional crops and transfer the value-added of processing from the local population to multinational corporations.
 Your tax-deductible contributions to *Soy Alert* help pay for education and legal expenses. Make checks payable to the Weston A. Price Foundation.

EXHIBIT-SOY

Myth: Soy foods can prevent osteoporosis.
Truth: Soy foods can cause deficiencies in calcium and vitamin D, both needed for healthy bones. Calcium from bone broths and vitamin D from seafood, lard and organ meats prevent osteoporosis in Asian countries—not soy foods.

Myth: Modern soy foods protect against many types of cancer.
Truth: A British government report concluded that there is little evidence that soy foods protect against breast cancer or any other form of cancer. In fact, soy foods may result in an increased risk of cancer.

Myth: Soy foods are safe and beneficial for women to use in their postmenopausal years.
Truth: Soy foods can stimulate the growth of estrogen-dependent tumors and cause thyroid problems. Low thyroid function is associated with difficulties in menopause.

Myth: Phytoestrogens in soy foods can enhance mental ability.
Truth: A recent study found that women with the highest levels of estrogen in their blood had the lowest levels of cognitive function; in Japanese Americans, tofu consumption in mid-life is associated with the occurrence of Alzheimer's disease in later life.

Myths and Truths About Soy

Myth: Use of soy as a food dates back many thousands of years.
Truth: Soy was first used as a food during the late Chou dynasty (1134-246 BC), only after the Chinese learned to ferment soybeans to make foods like *tempeh*, *natto* and *tamari*.
Myth: Asians consume large amounts of soy foods.
Truth: Average consumption of soy foods in China is 10 grams (about 2 teaspoons) per day and 30 to 60 grams (1-2 tablespoons) in Japan. Asians consume soy foods in small amounts as a condiment and not as a replacement for animal foods.

Myth: Modern soy foods confer the same health benefits as traditionally fermented soy foods.
Truth: Most modern soy foods are not fermented to neutralize toxins in soybeans, and are processed in a way that over-denatures proteins and increases levels of carcinogens.

Myth: Soy foods provide complete protein.
Truth: Like all legumes, soybeans are deficient in sulfur-containing amino acids methionine and cysteine. In addition, modern processing denatures fragile lysine.

Myth: Fermented soy foods can provide vitamin B₁₂ in vegetarian diets.
Truth: The compound that resembles vitamin B₁₂ in soy cannot be used by the human body; in fact, soy foods cause the body to require more B₁₂.
Myth: Soy formula is safe for infants.
Truth: Soy foods contain trypsin inhibitors that inhibit protein digestion and adversely affect pancreatic function. In test animals, diets high in trypsin inhibitors led to stunted growth and pancreatic disorders. Soy foods increase the body's requirement for vitamin D, needed for strong bones and normal growth. Phytic acid in soy foods results in re-

For further information and references, see www.soyonline.com or <http://www.westonaprice.org/soy-alert/>

017027

SKU, IT	CHOP	DESCRIPTION	BEF.	FISCHAL	DATE	UNIT
			BEF.		2012	AFTER
221600116	H/W	MEATBALLS, 10Z, 70% SOY FULLY COOKED (25)				
21600144	H/V	HAMBURGER PATTY, 40Z, 11.48% SOY PRODUCT (40)				
		BEF ALTERNATIVE				
21600080	H	VEGGIE BURGER, SOY AND VEGETABLE BLEND, 40Z PATTY (40)				
21600080	H	VEGGIE BURGER, SOY AND VEGETABLE BLEND, BULK (50)				
		CHICKEN				
21600410	W	CHICKEN, WHITE PATTY, 11.3% SOY, 40Z, FC, BREADED (25)				
21600419	W	CHICKEN NUGGETS, 1/20Z, F.C. BREADED				
21600408	W	PULLED CHICKEN, FULLY COOKED				
		FISH				
21600303	W	FISH, WEDGE, 40Z, PRE-COOKED, BREADED (NEW)				
		PORK				
21600219	M	HAM, FRESH, BONELESS (C.W.)				
		TURKEY - LINKS AND PATTIES				
21600416	H/V	TURKEY, RAW, GROUND, WITH 11.48 SOY, BULK (50)				
21600414	H	TURKEY/CHICKEN SKEWAGE, 11.48% SOY, PATTIES, 40Z (40)				
21600417	W	TURKEY/CHICKEN FRANKS, 8.5% SOY, 40Z, LINKS (35)				
21600403	M	TURKEY/CHICKEN POLISH SAUSAGE, 8.42% SOY, 40Z, LINKS (35)				
21600404	W	TURKEY T/C ROPE SAUSAGE, SIMPKED, 12.35% SOY, 40Z, LINKS (35)				
		TURKEY - WHOLE AND SLICED				
21600602	W	TURKEY/CHICKEN BACON, 8.25% SOY, SLICED, 7/16, (40)				
21600509	W	TURKEY/CHICKEN BOLONIA 6.96% SOY CHUB (C.W.)				
21600512	W	TURKEY/CHICKEN BOLONIA 6.96% SOY SLICED (C.W.)				
21600508	M/V	TURKEY/CHICKEN SALAMI 8.43% SOY CHUB (C.W.)				
21600513	M/V	TURKEY/CHICKEN SALAMI 8.43% SOY SLICED (40)				
21600502	W	TURKEY/CHICKEN (HONEY ADDED) SOY CHUB (C.W.)				
21600514	W	TURKEY/CHICKEN (HONEY ADDED) SOY SLICED (40)				
21600503	W	TURKEY/CHICKEN (4X4) 7.98% SOY CHUB (C.W.)				

EXHIBIT - SOY INTAKE

10/19/19

10/19/19

UNITED STATES DISTRICT COURT
for the

Southern District of Illinois

ROBERT BOSTIC

Plaintiff(s)

DOCTOR VIREN SHAH et al

Defendant(s)

Case Number: _____

CERTIFICATE OF SERVICE

I hereby certify that on 9-20-15, I electronically filed A 1983 W/

EXHIBITS

_____ with the Clerk of Court using the
CM/ECF system which will send notification of such filing(s) to the following:

U.S. DIST. COURT

Box # 249

EAST, ST. LOUIS, IL, 62202

and I hereby certify that on [date], I mailed by United States Postal Service, the
document(s) to the following non-registered participants:

Respectfully submitted,

Robert L Bostic

Name of Password Registrant

P.O. Box # 999

Address

PINCKNEYVILLE, IL 62274

City, State, Zip

Phone: () -

Fax: () -

E-mail: @

Attorney bar number (if applicable)

140F16